

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :  
MATTHEW CHRISTIAN WETZEL :  
Debtor : CHAPTER 13  
:  
JACK N. ZAHAROPOULOS :  
STANDING CHAPTER 13 TRUSTEE :  
Movant : CASE NO. 1-24-03323  
:  
MATTHEW CHRISTIAN WETZEL :  
Respondent :  
:

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 5<sup>th</sup> day of February 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. Debtor(s)' Plan violates 11 U.S.C. §1325(a)(4) in that the value of property to be distributed under the Plan on account of each allowed unsecured claim is less than the amount that would be paid on such claim if the estate were liquidated under Chapter 7. More specifically, Debtor has access to non-exempt equity in the following:
  - a. Residential real estate. Trustee requests proof of the value of the Debtor(s) home as stated in his/her schedules.
2. Trustee avers that Debtor(s)' Plan is not feasible based upon the following:
  - a. Insufficient Monthly Net Income as indicated on Schedules I and J.
  - b. The Plan fails to provide that the sale or refinance of Debtor(s) real estate will occur within six (6) months.
3. Trustee provides notice to the Court as to the ineffectiveness of Debtor(s)' Chapter 13 Plan for the following reasons:
  - a. Clarification of vesting property. Because non-exempt equity exists, the Plan should provide for vesting at closing. Accordingly, the Plan violates §1325(a)(4).

[THE REMAINDER OF THIS PAGE IS INTENTIONALLY LEFT BLANK]

WHEREFORE, Trustee alleges and avers that Debtor(s)' Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- b. Deny confirmation of Debtor(s)' Plan.
- c. Dismiss or convert Debtor(s)' case.
- d. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/ Agatha R. McHale  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 5<sup>th</sup> day of February 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the Unites States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

GAIL L HILLS, ESQUIRE  
LAW OFFICE OF GAIL L HILLS  
PO BOX 628  
CARLISLE, PA 17013-

/s/Tammy Life  
\_\_\_\_\_  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee